



# EXHIBIT J

[REDACTED] - [REDACTED]  
Erwin Six - April 25, 2025

Page 1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE EASTERN DISTRICT OF TEXAS  
3 MARSHALL DIVISION

4 \_\_\_\_\_ )  
5 BARCO, INC. AND BARCO NV, )  
6 Plaintiffs, )  
7 -against- ) Civil Action No. :  
8 YEALINK (USA) NETWORK TECHNOLOGY CO., ) 2:23-cv-00521  
9 LTD., AND YEALINK NETWORK TECHNOLOGY ) (JRG) (RSP)  
10 CO., LTD. )  
11 Defendants. )  
12 \_\_\_\_\_ )

13 \*\*\*\*\*  
14 \*\*\*\*\*

15  
16 VIDEOTAPED DEPOSITION UNDER ORAL EXAMINATION OF  
17 ERWIN SIX

18 DATE: April 25, 2025

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REPORTED BY: CHARLENE FRIEDMAN, CCR, RPR, CRR

[REDACTED] - [REDACTED]  
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8                   TRANSCRIPT of the deposition of the  
9                   ERWIN SIX, called for Oral Examination in the  
10                  above-captioned matter, said deposition being taken by  
11                  and before CHARLENE FRIEDMAN, a Notary Public and  
12                  Certified Court Reporter, a Registered Professional  
13                  Reporter, and a Certified Realtime Reporter, at K&L  
14                  Gates, LLP, 599 Lexington Avenue, New York, New York, on  
15                  April 25, 2025, commencing at approximately 10:07 in the  
16                  morning.

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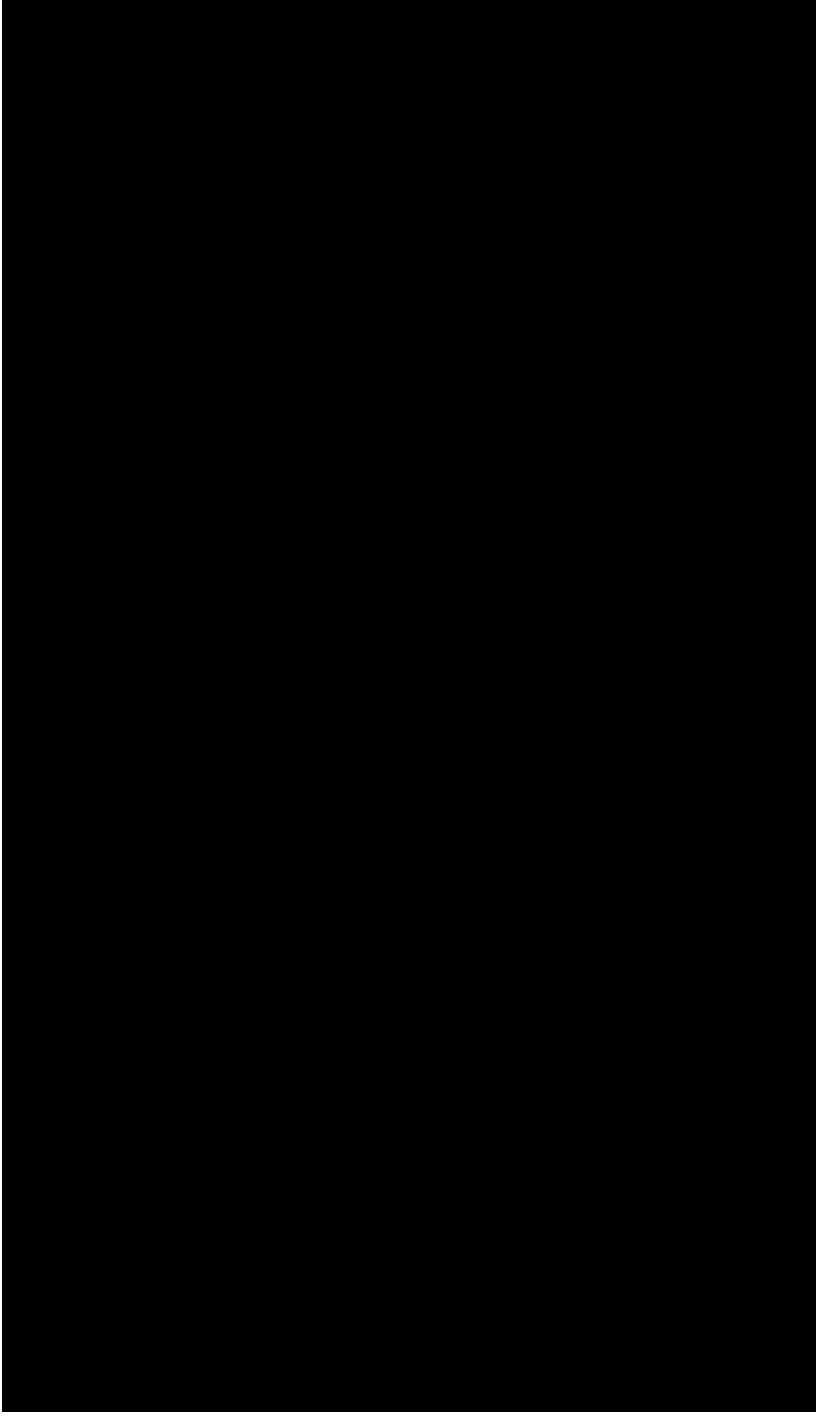
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[REDACTED] - [REDACTED]  
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1       patents, correct, all the patents listed  
2       here?  
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[REDACTED] - [REDACTED]  
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1 valuable to Barco?

2 MR. CENTURELLI: I'm going to  
3 object to that question to the extent it  
4 calls for attorney-client privileged  
5 communication and caution you not to  
6 reveal any attorney-client privileged  
7 communications or instruction you may  
8 have received, but if you're able to  
9 otherwise, answer the question.

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 MR. CENTURELLI: I'm going to  
24 object, and -- to form and my prior  
25 instruction, and also asked and

[REDACTED] - [REDACTED]  
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21                   Here it is a proposal which we made  
22                   to you where we know you were already using  
23                   some of our patents, right. So that's taking  
24                   that into account, for instance.  
25                   It's also taking into account the

[REDACTED] - [REDACTED]  
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1 quality difference which we were talking  
2 about, right. There were a number of aspects  
3 which we -- we take together.

4 Q I see.

5 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10 A Yes.

11 Q What are they?

12 A [REDACTED]

[REDACTED] So we had already a  
14 relation with them. We know that products  
15 and how they're dealing with us. It was a  
16 contract with a United States company.

17 If -- I mean, contracts, agreements  
18 are always contracts. If something breaks,  
19 that is a difference of whether it's a  
20 contract in the U.S. or whether it's a  
21 contract in another country. There are  
22 various aspects to that.

23 That also -- the moment that this  
24 was made, extra patents related to these ones  
25 were already granted, meanwhile, compared to

[REDACTED] - [REDACTED]  
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1 [REDACTED]

2 [REDACTED]. So

3 that all changes the whole value at that

4 moment in time for your patents.

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Q I understand. Thank you.

16 (Reporter clarification.)

17 A Yes.

18 Q So let's go back to the factors you  
19 had just discussed that made the Yealink  
20 situation different.

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 A Yes.

25 Q I want you to think back to 2020.

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1 At that time, was Yealink already  
2 on the U.S. market with products that, in  
3 your opinion, used Barco's patented  
4 technologies?

5                   A     We -- Yealink came on our radar  
6                   somewhere in the fall of 2022. And that was  
7                   with was the launch of the WPP 30 product.

8 Q Okay.

9 (Reporter clarification.)

10 A WPP. And their meeting bar, the  
11 820 meeting bar, which was then launched  
12 around that time.

13 Q Okay. So from Barco's perspective,  
14 it was not until fall of 2022 that Yealink  
15 started using its patented technology,  
16 correct?

17 MR. CENTURELLI: Objection to the  
18 form of the question to the mis -- it  
19 misstates evidence.

20 A So can you --

21 Q Do you need the question again?

22 A Yes.

23 And please correct the form then to  
24 make it more clear.

25 Q Okay. I know. Let me try. I just

[REDACTED] - [REDACTED]  
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1 want to clarify your answer.

2 So it wasn't until fall of 2022,  
3 then, that Barco realized that Yealink had  
4 products on -- let me rephrase. I'm sorry.

5 So it wasn't until fall of 2022  
6 does Barco contend that Yealink started  
7 having products in the market that used  
8 Barco's patented technology, correct?

9 MR. CENTURELLI: Objection, form,  
10 to the extent it misstates the record.

11 A You're not seeing what I -- what I  
12 first said, and what I first said was that  
13 Yealink came on the radar in the fall of  
14 2022.

15 Q Okay. So again -- well, let's stay  
16 with the fall of 2022.

17 So fall of 2022, Yealink was  
18 already in the market, correct?

19 A Yes.

20 Q Crestron was not yet in the market?

21 A No.

22 Q Okay. And --

23 A Or not with the button, no.

24 Q Thank you.

25 Again, if we go back to 2020, does

[REDACTED] - [REDACTED]  
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1 Barco have an opinion whether Yealink was  
2 already in the U.S. market and using Barco's  
3 patented technology?

4 A We didn't have that opinion yet.

5 Q Okay. But sitting here today, do  
6 you have an opinion?

7 A Well, we learned the WPP 20 was  
8 there before.

9 Q Okay.

10 A That was also a product in the  
11 market, which at that moment in time didn't  
12 reach our radar yet.

13 Q That's fine.

14 So I'm just asking about your  
15 opinion today.

16 So sitting here today, again, my  
17 question is in 2020, was Yealink already in  
18 the U.S. market with products that used  
19 Barco's patented technology?

20 MR. CENTURELLI: Objection to form,  
21 asked and answered to the extent it  
22 misstates evidence that's already in the  
23 record.

24 THE WITNESS: Can you repeat that?

25 MR. CENTURELLI: Objection to form.

[REDACTED] - [REDACTED]  
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1                   THE WITNESS: Okay. Objection to  
2                   form.

3                   A     Can you repeat that?

4                   Q     Again, I'm not trying to -- I'm  
5                   just trying to clarify.

6                   MR. CENTURELLI: I disagree.

7                   I think you're trying to confuse  
8                   the witness and mislead the witness.

9                   You know what the allegations are in the  
10                   case, and you're trying to --

11                   MR. YANG: Which is fine.

12                   I just want to confirm from the  
13                   witness, then.

14                   And again, counsel, I do not  
15                   appreciate the way you're, you know,  
16                   characterizing my intentions. I'm  
17                   asking what I think is a simple  
18                   question.

19                   Q     Again, Mr. Six, is it Barco's  
20                   contention that in 2022, Yealink was already  
21                   on the market with products that embraced  
22                   Barco's patented technology?

23                   A     At that moment in time, the moment  
24                   that's in 2020 that we -- that it gets on the  
25                   radar, we don't know that yet.

[REDACTED] - [REDACTED]  
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1 Q I'm not trying to confuse you.

2 Again, I'm just -- sitting here  
3 today, does Barco have an opinion whether  
4 that was the case in 2020?

5 A Yes.

6 If we now know with the analysis we  
7 did, right, we know that they did in 2020,  
8 when it was launched, that at that moment in  
9 time that was the case.

10 Q Thank you.

11 [REDACTED]

[REDACTED]

13 A You mean whether it was already  
14 launched?

15 Q In 2020.

16 A No.

17 Q Thank you.

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

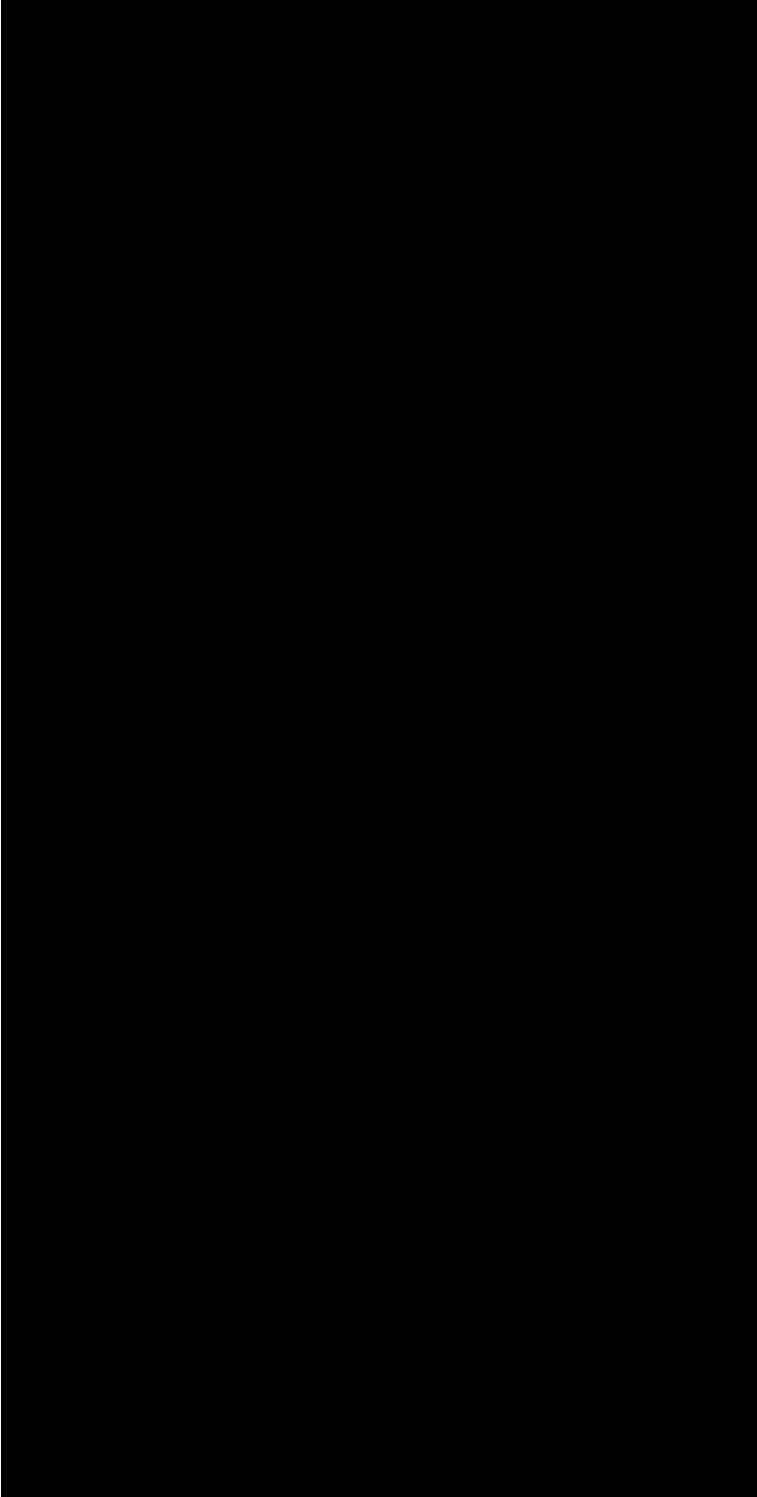
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[REDACTED] - [REDACTED]  
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6 Q And by 2020, was Yealink a U.S.  
7 company?

8 A In what moment in 2020?

9 Q Was Yealink ever a U.S. company, to  
10 your knowledge?

11 A Yes.

12 Q So Barco considers Yealink to be a  
13 U.S. company?

14 MR. CENTURELLI: I'm going to  
15 object to form.

16 A You have a subsidiary in the U.S.

17 Q Okay. Again, I'm not trying to  
18 confuse you.

19 I just want to know, does Barco  
20 consider Yealink to be a U.S. company,  
21 setting aside the subsidiary?

22 MR. CENTURELLI: Objection to form.

23 A It depends with whom you're going  
24 to sign the contract, I mean, the contracts  
25 with whom are we going to sign and which

[REDACTED] - [REDACTED]  
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1       legal entity are going to sign it.

2       [REDACTED]  
3       [REDACTED]  
4       [REDACTED]

5           Q     Is Yealink a U.S. company in the  
6        same sense that Crestron is a U.S. company?

7           MR. CENTURELLI: Objection to form.

8           A     It's different, yes. They're  
9        different.

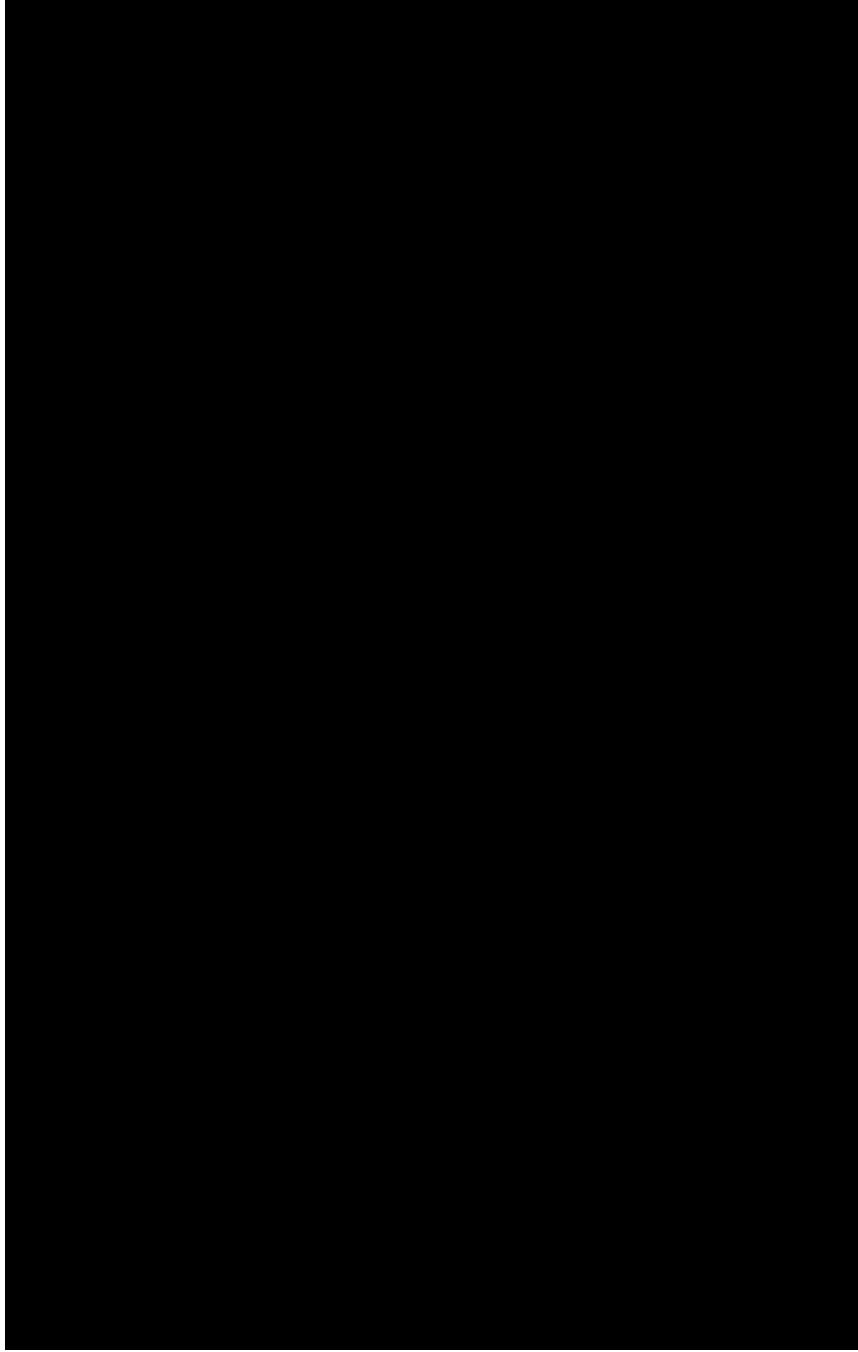
10       [REDACTED]  
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15       [REDACTED]  
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17       [REDACTED]  
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19       [REDACTED]  
20       [REDACTED]  
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22       [REDACTED]  
23       [REDACTED]  
24       [REDACTED]  
25       [REDACTED]

[REDACTED] - [REDACTED]  
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1 which is different. We discussed it in the  
2 previous questions. We discussed can you  
3 really segment this out in the market.

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[REDACTED] - [REDACTED]  
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6 MR. YANG: I believe I can wrap-up  
7 here.

8 Do you want to give me a minute? I  
9 can look over my notes.

10 MR. CENTURELLI: Sure.

11 Do you want to go off record for a  
12 few minutes?

13 MR. YANG: Yes.

14 VIDEO OPERATOR: Off the record,  
15 2:55 p.m., April 25, 2025.

16 (Brief recess taken.)

17 VIDEO OPERATOR: On the record at  
18 3:05 p.m., April 25, 2025.

19 Q Mr. Six, other than what you may  
20 have obtained from your legal counsel, do you  
21 have any opinion as to what the asserted  
22 patents are directed to?

23 A This is all discussion with our  
24 attorneys, whether it's our patent attorneys  
25 or legal attorneys.

[REDACTED] - [REDACTED]  
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1 C E R T I F I C A T E

2 I, CHARLENE FRIEDMAN, a Certified Court  
3 Reporter and Notary Public, qualified in and for  
4 the State of New Jersey do hereby certify that  
5 prior to the commencement of the examination ERWIN  
6 SIX was duly sworn by me to testify to the truth  
7 the whole truth and nothing but the truth.

8 I DO FURTHER CERTIFY that the foregoing  
9 is a true and accurate transcript of the testimony  
10 as taken stenographically by and before me at the  
11 time, place and on the date hereinbefore set forth.

12 I DO FURTHER certify that I am neither a  
13 relative of nor employee nor attorney nor counsel  
14 for any of the parties to this action, and that I  
15 am neither a relative nor employee of such attorney  
16 or counsel, and that I am not financially  
17 interested in the action.

18  
19   
20

21 CHARLENE FRIEDMAN, RPR, CRR, CCR of the  
22 State of New Jersey  
23 License No: 30X100204900  
24 Date: April 25, 2025  
25